

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

Jennifer Artz, et al. v. Endo Health Solutions Inc., et al.

Case No. 1:19-OP-45459

Michelle Frost v. Endo Health Solutions Inc. et al.

Case No. 1:18-OP-46327

Salmons v. Purdue Pharma L.P., et al.

Case No. 1:18-OP-45268

MDL No. 2804

Case No. 17-md-2804

Judge Dan Aaron Polster

DEFENDANTS' CONSENT MOTION FOR LEAVE TO EXCEED PAGE LIMIT

Pursuant to Local Rule 7.1, Defendants respectfully move this Court for leave to file their Memorandum of Opposition to NAS Plaintiffs' Motion for Class Certification in excess of the 40-page limit. Defendants request leave to file a Memorandum of Opposition of no more than 65 pages.¹

Good cause exists for the relief requested. Plaintiffs' motion for class certification, the memorandum in support of which is 65 pages, raises a host of issues, addresses claims and allegations raised across multiple complaints, and seeks certification of four separate classes. See ECF Nos. 3066, 3066-1. This Court granted Plaintiffs' request for leave to submit a 70-page memorandum, a request that included Plaintiffs' agreement to "consent to allowing Defendants

¹ Several defendants named in this litigation are not subject to the Court's personal jurisdiction. This opposition is filed subject to and without waiving all defenses, including but not limited to lack of personal jurisdiction, failure of service of process, and ineffective service of process.

to exceed the page limitations on their response.” ECF No. 3063. Defendants intend to file an opposition that is shorter than the leave previously granted, and Plaintiffs have confirmed their consent to Defendants’ request.

Accordingly, Defendants respectfully request that this Court allow Defendants to file their Memorandum of Opposition to NAS Plaintiffs’ Motion for Class Certification in excess of 40 pages, but no more than 65 pages.

DATED: October 5, 2020

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via the Court's ECF system
to all counsel of record.

/s/ Mark H. Lynch
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